

Valir Health

I. Leading with Integrity:

“During employee orientation, the CEO, Garyl Geist, is the first person the new employees meet. He spends time with them, explaining the history of the company and reviewing the Standards of the company. Our orientation program is centered on our company Compliance Program and our Standards of Conduct.”

“When the company was first established in 1999, one of the first policies/programs put in place was our compliance program. A Compliance/Ethics committee was formed and met monthly to discuss specific issues that arose.”

“As the Company grew and saw continued growth ahead, a large group of people were invited to share their ideas of our company’s mission and core values. From that meeting, a formal mission statement and list of core values were developed as well as our Standards of Conduct. This was a team effort from all divisions and all levels of staff, and is truly our company’s values.”

“...peer accountability is one of the key ways our senior leadership is held responsible for operating within our expected ethical framework.”

“...Standards of Conduct posted in all our offices and facilities....”

“When the company was very young and still quite small, one of our employees suffered a stroke and was unable to work.....Valir continued to pay the employee’s salary for an entire year until the employee and family were able to get on their feet.”

II. Cultivating an Ethical Culture

“Our annual employee evaluation lists each Core Value and the employee and supervisor must list specific examples of how the employee achieved each Core Value.”

“Each month, members from each division gather to report on the status of their division and implement action plans for anything less than 100% compliant.”

“We also have an inhouse Supervisor School where we teach and train supervisors to make decisions based upon our core values and mission statement.”

“No one employee is valued over another employee, regardless of their position in our company.”

“...our Rehabilitation Hospital has a program in place that uses care coins to reward exceptional behavior.if an employee is seen by another employee going above and beyond for a patient, co-worker, or someone in the community, they are recognized for their efforts and given a care coin.”

III. Forthright Communications

“...our customers have access to the hotline as well to report any external beliefs or questions of ethical behavior.”

“Every level of Valir routinely asks for ‘two-way communications’. During annual performance evaluations, Vice Presidents have asked for feedback from supervisors’ subordinates, and so on for every level of employee.”

“...it is stressed that there are NEVER any punitive responses to internal reporting of concerns or suspected unethical behavior. All calls to the hotline are kept totally anonymous.”

IV. Corporate Social Responsibility: Strengthening the Community

“One of the most evident areas of Valir’s community responsibility is in the care of indigent patients. In every division, indigent patients are accepted and cared for as if they had all the money in the world.”

“Within Valir there is also a continuous indigent fund. This account is funded by the employees of Valir and Valir Health.”

“Valir also is committed to the community through the organizations and events that are important to our staff. This year, Valir was proud to sponsor the U.S. Paralympic team and one of their coaches from our own staff.”

V. Building Trust in Relationships

“Doing business is the process of building a trusting relationship with people. Some of the principles taught at Valir include: being organized and dependable, handling complaints promptly and honestly, being a valuable resource to our clients, creating solutions that add value for our customers, being a partner with our customer, offering great customer, patient, employee service and always making decisions based on “doing the right thing.”

“Our leaders and managers understand that trust is built by showing competence and credibility. Competence is getting the job done right regardless of the obstacles in our way. Our sales and marketing approach is built on showing competence and credibility. Credibility is our character, integrity and honesty. Hiring the right people and providing them with ongoing training on our Core Values is key to building our credibility with our customers, employees and the community. Also, many of our customers are the result of referrals from our current customers.”

“Our marketing approach is based upon Valir’s strengths and not our competition’s weaknesses....”

Valir had extensive documentation that impressed the judges, but could not be reproduced in entirety on this site. However, a few excerpts are included in PDF files on the following pages. For more information, interested parties are encouraged to contact Sandra Nettleton, Compliance Officer, at (405) 609-3651.

Valir Health

In preparing the program for the awards event, each company was asked to respond to questions about their organization.

- 1) Brief description of the company's services and extent of operations.

Valir Health is a comprehensive network of services which include physical, occupational and speech therapy in nursing homes across the state of Oklahoma, Colorado and soon to be Texas. This led to additional therapy outlets in 13 outpatient clinics, as well as one of the leading Rehabilitation Hospitals in Oklahoma. Within the expansion of services, Valir has opened a home health agency, hospice organization, medical billing company, urgent care and long term care billing, consulting and cost reporting services. Valir's operations are involved with over 100 facilities right here in Oklahoma. Within the last 7 years Valir has grown from a handful of employees to just under 500 loyal, dedicated and compassionate individuals who share the vision of Valir's core principles.

- 2) Brief statement about your organization's guiding principles or core values.

Valir is committed to "Establishing a Higher Standard" through integrity and compassion for all we serve. The basis of this goal is to make sure that all of our employees respect the importance of excellent patient care, by always doing the "right thing". By working as a team, respecting not just the patient, but fellow employees, an individual will grow within our company, especially if they will take ownership of their actions and embrace the entrepreneurial spirit which Valir enjoys. But at the heart of it all will be the compassion for the patient and for one another that will build strong relationships and put our organization on the map with our community.

- 3) Identify the top three processes, tools or practices that your company uses to reinforce ethical behavior in your business operations. In other words, what do you feel are the most effective methods used by your organization in maintaining its commitment to high standards?

Our ethics/compliance committee meets with the corporate compliance officer on a monthly basis to review any potential violations. If a violation does exist, the ethics/compliance committee works closely with the human resources department to address the problem with the employee, clinic or provider of services. In addition, the ethics/compliance committee is briefed on all audits conducted by the compliance officer during the month. No department, provider or practice is immune to an internal audit for ethical, compliant practices. On a monthly basis, the compliance officer briefs the ownership and board on the status of all potential violations or areas in which the company is doing very well. Due to the rapid growth and expansion of Valir, there are many times that outside consultants have been brought in to review the organization, including actual representatives from CMS (Medicare). When in doubt, Valir employs the knowledge of two of the leading law firms in Oklahoma City to gain perspective on the right way to carry out its goals. Finally, as you walk the halls of Valir, there are beautifully framed and matted quotes which all focus on character. If you sit in the CEO's or other owner's offices you will be quickly reminded of the character that is to be expected. Again, extremely elegant quotes framed and highlighted by special lighting. And of course in the boardroom, no one who comes and visits can miss the same type of highlighted principles which are hanging for all to see, pointing out the most essential of character. The point is, that you can not go anywhere within the company and not see a reminder of what is expected from Valir employees, visitors or vendors.

- 4) Short reference to one of the key major ethical issues you anticipate your employees or organization will likely encounter in the future and the proactive steps you are taking now to address this issue.

As our company grows, issues can arise from just about any division that we have. However, as our Home Health Agency is facing its certification for Medicare, there will be several issues that could give rise to concern. Therefore, from the very start, we have had attorney opinion letters, constant review of policies and procedures and mock surveys to make sure we identify any potential problems. We took this same initiative when implementing our hospice company. When the real survey came, we passed with flying colors and were open immediately, while many of our competitors had to have several visits from a survey team to be deemed compliant.



Our Mission...
Valir Health is committed to
Establishing a Higher Standard
through integrity and
compassion for all we serve.

Core Values:

- Excellent patient, customer, and employee care
- Do the “Right Thing”
- Teamwork
- Show respect for people
- Take ownership for your actions
- Entrepreneurial spirit
- Build strong relationships within our company and community



STANDARDS OF CONDUCT

Being an employee or representative of VALIR HEALTH brings with it the responsibility of upholding *Our Mission....Valir Health is committed to Establishing a Higher Standard through integrity and compassion for all we serve.* Inherent to our mission is a commitment to ethical business behavior. The Valir Health Standards of Conduct are straightforward and simple. Attending to its letter and spirit is a requirement of every Valir Health team member.

- Deliver compassionate and exceptional quality health care services to all patients and respect their rights.
- Exercise and display good judgment and obey all laws in performing job duties.
- Ensure that health care services are accurately coded and billed timely according to payer requirements.
- Preserve confidential business information and patient health records.
- Conduct our business activities to avoid any conflict of interest or the appearance of a conflict of interest.
- Make and accept Referrals based upon the patient's health care needs and in accordance with the law.
- Cooperate with all internal investigations, legitimate government investigations, and accrediting bodies.
- Protect our patients and our company by reporting any unethical, incompetent or illegal acts promptly to the appropriate supervisor.

Reporting Violations: It is the responsibility of all Valir Health employees to bring violations, or suspected violations of the Standards of Conduct to the attention of their supervisor and/or the Compliance Officer.

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